

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

KATHRYN GAY)	CIVIL ACTION
<i>Plaintiff</i>)	
)	NO. 2:18-2880
v.)	
)	
THE CHILDREN'S HOSPITAL OF)	
PHILADELPHIA; ELENI LANTZOUNI;)	
JENNIFER LOUIS-JACQUES; MICHELE)	
ZUCKER; LEELA JACKSON; KATIE)	
HOEVELER; MORTIMER PONCZ; AND)	
ALAN R. COHEN)	
<i>Defendants</i>)	
)	
)	

MOTION TO MAINTAIN TRIAL SCHEDULE

Plaintiff, by and through her attorneys, hereby requests the Court maintain the current trial schedule. Counsel for Plaintiffs were contacted by counsel for Defendants at approximately 11:00 AM ET today (Sunday March 19th) indicating that Defendants will move for a continuance of trial.

In support of her position, Plaintiff files an accompanying memorandum setting forth Plaintiff's position in full.

Respectfully submitted,

Date: March 19, 2023

/s/ Andrew Lacy, Jr.

Andrew Lacy, Jr. Esq. (Bar No. 321232)
THE LACY EMPLOYMENT LAW FIRM LLC
2675 Market Street, Suite 200
Philadelphia PA, 19104
Tel: (412) 301-3908
Andrew.lacy@employment-labor-law.com

Shane M. Rumbaugh (Bar No. 329687)
Alexander J. Keller (Bar. No 332297)
RUMBAUGH LAW PLLC
2400 Ansys Drive, Suite 102
Canonsburg, PA 15317
Tel: (724) 912-6781
Email: shane@rumbgh.com
alex@rumbgh.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded to the below Defendants on this date via the Court's electronic filing system:

Patrick Harrington
Douglas Weck
Lawrence G. McMichael
DILWORTH PAXSON LLP
1500 Market Street - Suite 3500E
Philadelphia, PA 19102
Phone: 215-575-7000
Fax: 215-575-7200
Email: pharrington@dilwrothlaw.com
Email: dweck@dilworthlaw.com
Email: lmcmichael@dilworthlaw.com

Date: March 19, 2023

/s/ Shane M. Rumbaugh

Shane M. Rumbaugh (Bar No. 329687)
RUMBAUGH LAW PLLC
2400 Ansys Drive, Suite 102
Canonsburg, PA 15317
Tel: (724) 912-6781
Email: alex@rumbagh.com